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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DARRELL DANIEL,

Defendant.

CASE NO. 2:24-cr-00261-JAM

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
SPEEDY TRIAL ACT; FINDINGS AND
ORDER**

DATE: December 10, 2024
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was reset for status on December 10, 2024. Subsequently, on the Court's own motion, this matter was reset for status on December 17, 2024.
2. By this stipulation, defendant now moves to continue the status conference until **March 11, 2025, at 09:00 a.m.** and to exclude time between December 10, 2024, and March 11, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with

1 this case includes law enforcement reports, photographs, audio recordings, and
2 search warrants related to a years-long investigation of criminal conduct that
3 spanned five years. All of this discovery has been either produced directly to
4 counsel and/or made available for inspection and copying.

5 b) Counsel for defendant desires additional time review the discovery,
6 conduct defense investigation, consult with her client, discuss potential resolution of
7 the matter, and otherwise prepare for trial.

8 c) Counsel for defendant believes that failure to grant the above-
9 requested continuance would deny her the reasonable time necessary for effective
10 preparation, taking into account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by
13 continuing the case as requested outweigh the interest of the public and the
14 defendant in a trial within the original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18
16 U.S.C. § 3161, et seq., within which trial must commence, the time period of
17 December 10, 2024 to March 11, 2025, inclusive, is deemed excludable pursuant to
18 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a
19 continuance granted by the Court at defendant's request on the basis of the Court's
20 finding that the ends of justice served by taking such action outweigh the best
21 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: November 27, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States
Attorney

Dated: November 27, 2024

/s/ MIA CRAGER
MIA CRAGER
Counsel for Defendant
DARRELL DANIEL

ORDER

IT IS SO FOUND AND ORDERED.

Dated: November 27, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE